

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**ROBERT CHARLES “CHARLIE”  
ROSEN, WILLIAM MICHAEL “MIKE”  
CROTHERS, AND PETER “PETE”  
MULDOON**

**Plaintiffs,**

**v.**

**TETON COUNTY BOARD OF COUNTY  
COMMISSIONERS, MATT CARR in his  
individual and official capacity as Teton  
County Sheriff, ERIN WEISMAN in her  
individual and official capacity as Teton  
County and Prosecuting Attorney, and  
BRETON BOMMER, DAVID HODGES,  
CLAYTON PLATT, ANDREW ROUNDY,  
CLARK ALLAN, AND RICHARD ROES,  
in their individual capacities,**

**Defendants.**

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**CASE NO. 22-CV-00028-NDF  
JURY TRIAL DEMANDED**

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE A SINGLE RESPONSE TO  
DEFENDANTS’ MOTIONS FOR SUMMARY JUDGMENT**

COME NOW Plaintiffs Robert Charles “Charlie” Rosen (“Rosen”), William Michael “Mike” Crothers (“Crothers”), and Peter “Pete” Muldoon (“Muldoon”) (together, “Plaintiffs”), by and through their attorneys and Pursuant to Local Rule 7.1(b)(2)(B), hereby move for leave to file a single Response to the various Defendants’ Motions for Summary Judgment.

Plaintiffs state as follows:

1. The three Plaintiffs have filed a sixty-nine page, sixteen-count complaint alleging several violations of State and Federal law aimed at several Defendants in their individual and official capacities.
2. The law enforcement Defendants, after first seeking leave of this Court, filed one combined, lengthy Motion and corresponding Memorandum in Support for Summary Judgment

rather than separate pleadings. The Memorandum was 48 pages in length. In its Order, this Court allowed Plaintiffs 50 pages to respond to law enforcement Defendants pleading.

3. The attorney Defendants, also after first seeking leave of this Court, filed a lengthy Motion and corresponding Memorandum in Support for Summary Judgment. The Memorandum was 28 pages in length. Under Local Rule 7.1(b)(2)(B), Plaintiffs are allowed 25 pages to respond to this pleading.

4. Both law enforcement Defendants' and attorney Defendants' Motions and Memorandums in support make numerous references to the others' pleading, making separate Responses difficult and unwieldy.

5. Based on the foregoing, Plaintiffs respectfully submit that good cause exists for them to file a single brief, and to file their Response in a pleading addressing all the points raised by the various Defendants. The brief will be no longer than 75 pages in length.

6. The responsive pleading is due on December 16, 2022.

7. Counsel reached out to the various Defendant's counsel by email and asked whether they objected to a single brief no greater than 75 pages in length. At the time of this filing, counsel has only heard from one of three attorneys. That defense attorney did not object.

WHEREFORE Plaintiffs respectfully request relief as set forth above, pursuant to the Order submitted herewith.

Dated: December 16, 2022

Respectfully submitted,

By /s/ Tom Fleener

Thomas Fleener, Wyo. State Bar #6-3747  
tom@fleenerlaw.com  
FLEENER PETERSEN, LLC  
506 S. 8th St.  
Laramie, WY 82070  
(307) 460-4333

Rex Mann – Admitted *pro hac vice*  
Texas Bar No. 24075509  
rmann@winston.com  
Dylan French – Admitted *pro hac vice*  
dfrench@winston.com  
WINSTON & STRAWN LLP  
2121 N. Pearl St., Suite 900  
Dallas, Texas 75201  
Telephone: 214-453-6500  
Of counsel: Professor Sheldon H. Nahmod  
1301 N. Dearborn St. #1206  
Chicago, Illinois 60610  
Email: snahmod@kentlaw.edu  
Phone (cell): 312-485-9599

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on counsel of record via the Court's CM/ECF system on this 16th day of December 2022

/s/ Tom Fleener

Thomas Fleener